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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VITOLI MOURZAKHANOV,)	
)	
Plaintiff,)	
)	
-against-)	07 CV 6205
)	
)	
DEWALT INDUSTRIAL TOOL CO.,)	
DEWALT CONSTRUCTION TOOLS and)	
BLACK AND DECKER (U.S.) INC.,)	
)	
Defendants.)	

PLAINTIFF'S AUTOMATIC DISCLOSURE :

Plaintiff VITOLI MOURZAKHANOV was injured on September 29, 2005, at approximately 11:15am, at a job site located at 1225 Morrison Avenue, Bronx, New York, when plaintiff was cutting a copper pipe with a reciprocating saw, the saw kicked back and landed on the palm of his left hand, cutting through his gloves and into his hand between the middle and ring fingers. He was taken to the emergency room at New York Westchester Square Medical Center and then transferred by ambulance to Jacobi Medical Center on that same day. A copy of the report from Lifeline Ambulance is attached hereto. He returned to Jacobi Medical Center for surgery on October 3, 2005.

Plaintiff VITOLI MOURZAKHANOV suffered the following injuries: Complex left hand full thickness tendon laceration; laceration of the ulnar digital nerve to the long finger on

the left hand in the third web space; numbness and loss of strength of grip in left hand. He underwent surgery on October 3, 2005, for repair of the third web space common digital nerve, requiring a vein graft.

Plaintiff VITOLI MOURZAKHANOV was treated by the following providers:

New York Westchester Square Medical Center
2475 St. Raymond Avenue
Bronx, New York 10461

Lifeline Ambulance
1865 Mayflower Avenue
Bronx, New York 10461

Jacobi Medical Center
1400 Pelham Parkway South
Bronx, New York 10461

Alan J. Dayan, M.D.
1715 Avenue T
Brooklyn, New York 11229

Leo Parnes, D.O.
201 Ocean Parkway
Brooklyn, New York 11218

Copies of those medical records and medical bills in plaintiff's possession are attached hereto. Authorizations for the medical records and medical bills from the named providers are attached hereto.

Plaintiff VITOLI MOURZAKHANOV's medical bills were paid by his Workers' Compensation insurance. His Workers' Compensation insurance carrier is:

New York State Insurance Fund
199 Church Street
New York, New York 10007

Copies of those Workers' Compensation records in plaintiff's possession are attached hereto. An authorization for plaintiff's Workers' Compensation records is attached hereto.

Plaintiff VITOLI MOURZAKHANOV was employed as a plumber by:

Crestwood Mechanical Co., Inc.
2393 Butler Place
Bronx, New York 10462

Plaintiff was earning \$207.40 per day. Plaintiff was disabled from working due to his injuries from September 29, 2005, to December 17, 2005. His lost wages to date total \$2,666.57.

An authorization for plaintiff's employment records is attached hereto.

Dated: July 11, 2007

THE DURST LAW FIRM, P.C.

By: John E. Durst, Jr. (6544)
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To:

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